

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
HAZEL HALL ANDERSON : CHAPTER 13
Debtor. :

THE MONEY SOURCE INC :
Movant, :
vs. :
HAZEL HALL ANDERSON : CASE NO. 5-19-03127
Respondents. :

DEBTOR'S ANSWER TO MOTION FOR RELIEF FROM
AUTOMATIC STAY UNDER SECTION 362

AND NOW COMES, Hazel Hall Anderson, the Debtor, and files an Answer to The Money
Source Inc.'s Motion for Relief From the Automatic Stay:

1. Hazel Hall Anderson (hereinafter the "Debtor") filed a Chapter 13 bankruptcy proceeding with the U.S. Bankruptcy Court for the Middle District of Pennsylvania.
2. Movant alleges that Debtor has failed to make post-petition mortgage payments.
3. Debtor fell behind on payments to the Movant. Debtor requests that Movant approve a forbearance and that the missed payments be placed at the back end of the loan.
4. Movant is not entitled to relief from the automatic stay as the arrearage amount due has been paid or shall be paid through the Chapter 13 Plan, and/or a six (6) month Stipulation, and, therefore, the Movant is adequately protected.

WHEREFORE, the Debtor respectfully requests that Movant's Motion for Relief from the Automatic Stay be denied.

Respectfully submitted,

Date: May 11, 2021

/s/Tullio DeLuca
Tullio DeLuca, Esquire
PA ID# 59887
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on May 11, 2021, he caused a true and correct copy of
Debtor's Answer to The Money Source, Inc.'s Motion for Relief from the Automatic Stay to be served
Via First Class United States Mail, Postage Pre-paid in the above-referenced case, on the following:

Charles J. DeHart, III, Esq. at dehartstaff@ramapo.com

Rebecca Solarz, Esq. Rsolarz@kmlawgroup.com

Dated: May 11, 2021

/s/Tullio DeLuca
Tullio DeLuca, Esquire